

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JEFFERY DICKSON
Plaintiff

VS.

STATE FARM LLOYDS
Defendant

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Civil Action No. 4:16-cv-02467

PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Federal Rules of Civil Procedure 26(a)(1), I hereby submit the following initial disclosures:

1. **Witnesses.** The name, address, and telephone number of each individual likely to have discoverable information that may support my claim, and the information they possess (unless they will be used solely for impeachment):

Name of Individual Likely to have Discoverable Information	Contact Information (Address and Telephone Number)	Subject Matter of Discoverable Information
Jeffrey Dickson	c/o Michael J. Lowenberg 7941 Katy Freeway #306 Houston, Texas 77024	Full knowledge of all matters related to this suit
Dena K. Dickson	c/o Michael J. Lowenberg 7941 Katy Freeway #306 Houston, Texas 77024	Wife of Mr. Jeffrey Dickson and resident of home subject of this lawsuit
Evelyn Donaldson	c/o Beth McCahill Taylor Taylor, Taylor & Russell 2777 Allen Parkway, Suite 1000 Houston, Texas 77019 Phone: (713)615-6060	State Farm claims representative who denied Mr. Dickson's ability to amend original claim to include water damage as should have been allowed originally

Linden Sanderford	c/o Beth McCahill Taylor Taylor, Taylor & Russell 2777 Allen Parkway, Suite 1000 Houston, Texas 77019 Phone: (713)615-6060	Claims representative in May of 2014 who rejected initial insurance coverage claim
Jose Villafana	c/o Beth McCahill Taylor Taylor, Taylor & Russell 2777 Allen Parkway, Suite 1000 Houston, Texas 77019 Phone: (713)615-6060	Mr. Dickson's State Farm representative; knowledge of handling Plaintiff's claim(s) and information obtained during the claim.
"George"	c/o Beth McCahill Taylor Taylor, Taylor & Russell 2777 Allen Parkway, Suite 1000 Houston, Texas 77019 Phone: (713)615-6060	Worked with Jose Villafana's Agency and may have additional information regarding Mr. Dickson's claim
Peter J. Kosmoski, PE Brown Consulting Services, Inc.	20325 Budde Cemetery Road Houston, Texas 77388 Phone: 281-260-9749	Engineer for Brown Consulting Services, Inc. who wrote engineering report and supplemental report for State Farm on Mr. Dickson's property
Jorge A Alvarado Vasquez	c/o Beth McCahill Taylor Taylor, Taylor & Russell 2777 Allen Parkway, Suite 1000 Houston, Texas 77019 Phone: (713)615-6060	State Farm adjuster who sent Mr. Dickson a copy of his policy
Jennifer L Johnson Fire Operations - Texas Zone Phone: (972) 732-5015	c/o Beth McCahill Taylor Taylor, Taylor & Russell 2777 Allen Parkway, Suite 1000 Houston, Texas 77019 Phone: (713)615-6060	State Farm employee who sent a copy of Mr. Dickson's policy to Jorge A Alvarado Vasquez upon Mr. Dickson's request for a copy
Tom Muncey Herndon/Muncey, Inc. Investigative Plumbing	P.O. Box 218941 Houston, Texas 77218-8941 Phone: 281-579-1960	Investigative plumbing company who investigated the leak on Mr. Dickson's property in April of 2014
Leslie Stewart	c/o Beth McCahill Taylor Taylor, Taylor & Russell 2777 Allen Parkway, Suite 1000 Houston, Texas 77019 Phone: (713)615-6060	Adjuster for State Farm; knowledge of handling Plaintiff's claim(s) and information obtained during the claim.

Darrell Bowles, P.E.	Darrell Bowles, P.E., Consulting Engineer 13003 Stancliff Oaks St. Sugar Land TX 77478 Phone: 713-854-4562	Performed a structural analysis of Mr. Dickson's foundation
Gerard J. Duhon, P.E.	12402 Copperfield Drive Houston, TX 77031-3110 Phone: 281-788-7393	Mr. Dickson contacted in May of 2016 to get second opinion on his foundation
Mark Malia	c/o Beth McCahill Taylor Taylor, Taylor & Russell 2777 Allen Parkway, Suite 1000 Houston, Texas 77019 Phone: (713)615-6060	Claim Team Manager; knowledge of handling Plaintiff's claim(s) and information obtained during the claim.
Brenda Dudley	c/o Beth McCahill Taylor Taylor, Taylor & Russell 2777 Allen Parkway, Suite 1000 Houston, Texas 77019 Phone: (713)615-6060	Claim Team Manager; knowledge of handling Plaintiff's claim(s) and information obtained during the claim.
Bank of America, NA ISAOA ATIMA	P.O. Box 961291 Fort Worth, Texas 76161	Plaintiff's mortgage company; may have knowledge regarding Plaintiff's claims in this suit or damages
Premier America Federal Credit Union	19867 Prairie Street Chatsworth, California 91311 Phone: 818-772-4000	Plaintiff's second mortgage company; may have knowledge regarding Plaintiff's claims in this suit or damages
Fred Burnside	Burnside Plumbing Company 12011 Manorgate Dr. Houston, TX 77031 Phone: 832-274-6460 or 281-561-0580	Consulted with Mr. Dickson regarding his plumbing problem and performed work on the plumbing at Mr. Dickson's home

2. Documents and things. Copies, or descriptions by category and location, of all documents or things I have in my possession or control that I may use to support my claims (unless they will be used solely for impeachment):

Email correspondence between Plaintiff and representatives for Defendant.

State Farm Lloyds Policy.

Miscellaneous documents exchanged between Defendant's representatives and Plaintiff previously, including, but not limited to, engineering reports, plumbing estimates, etc.

Pictures of water damage caused to Plaintiff's home and subject of damages claimed in this suit.

All the above documents are in Plaintiff Counsel's possession and will be produced under separate cover.

3. **Damages computation.** A calculation of any category of damages I have suffered:

Replacement and Relocation of Drain Lines:	\$37,705.00
Repair of Water Damage to Home (initial estimate to be confirmed):	\$10,000.00
Court Costs	To be determined
Attorney's Fees	To be determined
Exemplary Damages	To be determined
Pre-Judgment Interest	To be determined

4. **Liability insurance.** Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

SUPPLEMENTATION

Plaintiff reserves the right to supplement these initial disclosures as discovery with this suit progresses.

Respectfully submitted,
THE LOWENBERG LAW FIRM, PLLC

By: /s/ Michael J. Lowenberg
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**ATTORNEYS FOR PLAINTIFF,
JEFFERY DICKSON**

CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Michael J. Lowenberg
MICHAEL J. LOWENBERG